PUBLIC VERSION

Before the
UNITED STATES COPYRIGHT ROYALTY BOARD
Library of Congress
Washington, D.C.

ORIGINAL

In the Matter of	
Determination of Royalty Rates for Digital Performance in Sound Recordings and Ephemeral Recordings (Web IV)	**Docket No. 14–CRB–0001–WR (2016–2020)**

GEORGE JOHNSON'S (GEO) MOTION IN SUPPORT OF SOUNDEXCHANGE PROPOSED PETITION FOR REHEARING

Pursuant to the January 4, 2016 Order Permitting Written Response(s) to SoundExchange Motion For Rehearing, George D. Johnson ("GEO") respectfully submits to Your Honors the following motion in *support* of SoundExchange's Proposed Petition for Rehearing.

GEO agrees with the following grounds by SoundExchange for why a rehearing must be granted. The standard[1] includes "a need to correct a clear error or prevent manifest injustice" and SoundExchange's Petition demonstrates the need for both.

As per the December 30, 2015 Order Regarding Delivery of Determination To George Johnson, GEO also intends to file a Motion or Petition for Rehearing by January 13, 2016, within the 15-day filing period from the date of that Order.

GEO's Motion for Rehearing will include separate grounds and argument in support of GEO's rates and terms, *but will also include the following grounds, evidence and testimony*

[1] "The Copyright Royalty Judges may grant rehearing upon a showing that any aspect of the determination may be erroneous." 37 C.F.R. § 353.1. The Judges have explained that rehearing is appropriate where "(1) there has been an intervening change in controlling law; (2) new evidence is available; or (3) there is a need to correct a clear error or prevent manifest injustice." Order Denying Motions for Rehearing, *SDARS II*, Dkt. No. 2011-1 CRB PSS/ SATELLITE II, Jan. 30, 2013 (Barnett, C.J.) (quotations omitted).

quoted in SoundExchange's case and their Proposed Petition for Rehearing — primarily, how the statutory rate and compulsory license create a "shadow" over every other so-called "free-market" negotiation and in turn, the government nano-rate (like in this case) is where every so-called private, free-market "benchmark" is first derived from. These are not private benchmarks but are originally derived from *one* government set-statutory rate and not from thousands (or millions by consumers) of price points that result because of actual and real, free-market negotiations.

One "benchmark" Merlin deal, as in Pandora's case at $.0011, is not a free-market deal.

If there were a fair or free-market in music, there would be no compulsory license or statutory rate originally setting the benchmark that all other private Licensees/Services then turn around and argue, "See, the government said $.0011 cents, so that's all we have to pay per-play."

INFLATION

Before I elaborate on SoundExchange's grounds based on the "shadow" of the statutory rate and compulsory license, I would also like to briefly agree with SoundExchange's grounds that the CPI inflation rate is too low and not an accurate calculation of real world inflation.

SoundExchange rightly states on Page 4, "The CPI escalation cannot be reconciled with the WBWS standard and constitutes legal error. The record also shows that the five-year term of the *statutory license supports a rate escalation greater than CPI.*"

In fact, the CPI or CPI-U currently hovering around an artificial 1.5 to 2%, according to the BLS[2] numbers, is really more around 9.6%[3] [4] using 1980-Based inflation calculations and

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[2] http://www.bls.gov/news.release/pdf/cpi.pdf Page 2 CPI-U "all items less food and energy"

[3] http://www.cnbc.com/id/42551209 Inflation Actually Near 10% Using Older Measure, by John Melloy on CNBC Tuesday, 12 Apr 2011

[4] http://www.shadowstats.com/alternate_data/inflation-charts Alternative Inflation Charts using 1980-Based and 1990-Based methods by John Williams.

5.5% using 1990 methodology. *Cumulative* inflation is also a key point here as well as the fact the current BLS CPI-U calculations clearly say "*all items less food and energy*". CNBC reported in a 2014 article by John Melloy titled *Inflation Actually Near 10% Using Older Measure*:

> "Inflation, using the reporting methodologies in place before 1980, hit an annual rate of **9.6 percent** in February, according to the Shadow Government Statistics newsletter.
>
> Since 1980, the Bureau of Labor Statistics has changed the way it calculates the CPI in order to account for the substitution of products, improvements in quality (i.e. iPad 2 costing the same as original iPad) and other things. Backing out more methods implemented in 1990 by the BLS still puts inflation at a **5.5 percent rate** and getting worse, according to the calculations by the newsletter's web site, shadowstats.com." (emphasis added)

Furthermore, the CPI isn't really a measure of inflation, but consumer spending patterns as prices change, plus doesn't include the falling value of money at 4.9%, according to a 2014 Forbes article titled *If You Want To Know The Real Rate Of Inflation, Don't Bother With The CPI:*

> "The CPI doesn't even meet the government's definition of inflation: The Bureau of Labor Statistics defines inflation "as a process of continuously rising prices or equivalently, of a continuously falling value of money."
>
> As I outlined above, the CPI is not a measurement of rising prices, rather it tracks consumer spending patterns that change as prices change. The CPI doesn't even touch the falling value of money. If it did the CPI would look much different.
>
> And the Fed has created a lot of money recently. The Fed's unprecedented bond buying program, Quantitative Easing, *created $116 million an hour for the entire year* last year. *It doesn't make sense that the BLS's measurement of inflation was only 1.5% last year*, while at the same time, *monetary inflation grew **4.9%**.*" (emphasis added)[5]

The CPI-U is primarily used to keep Social Security income payments as low as possible, not reflect actual inflation. GEO's respectfully submits to Your Honors that a 1980-Based calculation of CPI inflation, which includes food and energy and other actual expenses at a real world **9.6%** (or even a 1990-Based **5.5%** rate), would be a much more accurate benchmark than the current CPI-U. (*See* following **Exhibits 1 & 2** "*Alternative Inflation Charts*")

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[5] http://www.forbes.com/sites/perianneboring/2014/02/03/if-you-want-to-know-the-real-rate-of-inflation-dont-bother-with-the-cpi/ on Forbes by Perianne Boring, *If You Want To Know The Real Rate Of Inflation, Don't Bother With The CPI*

EXHIBIT 1 - 1990-Based Methodology

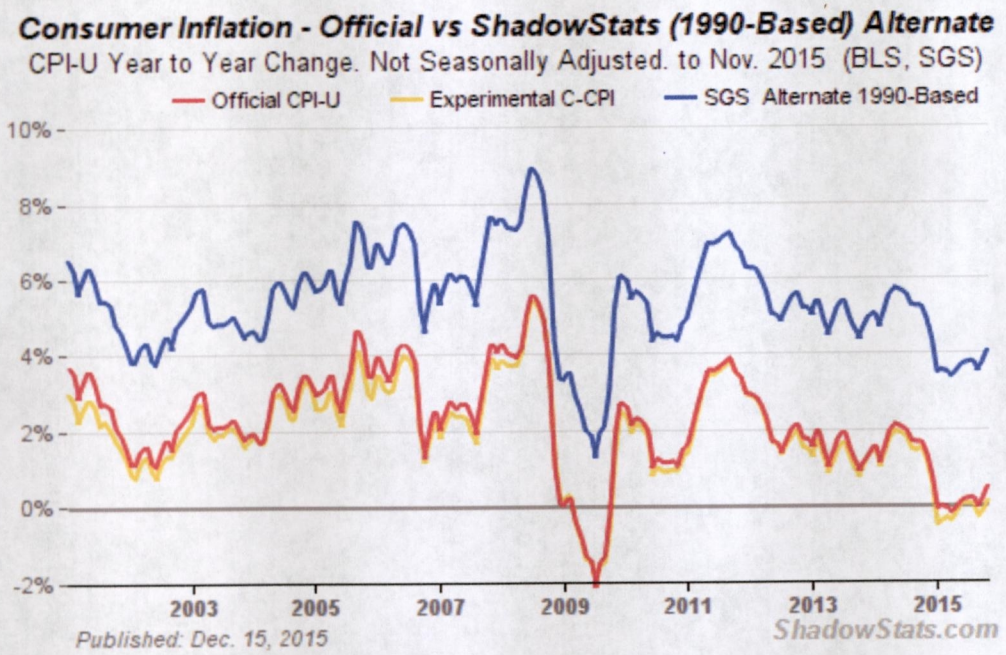
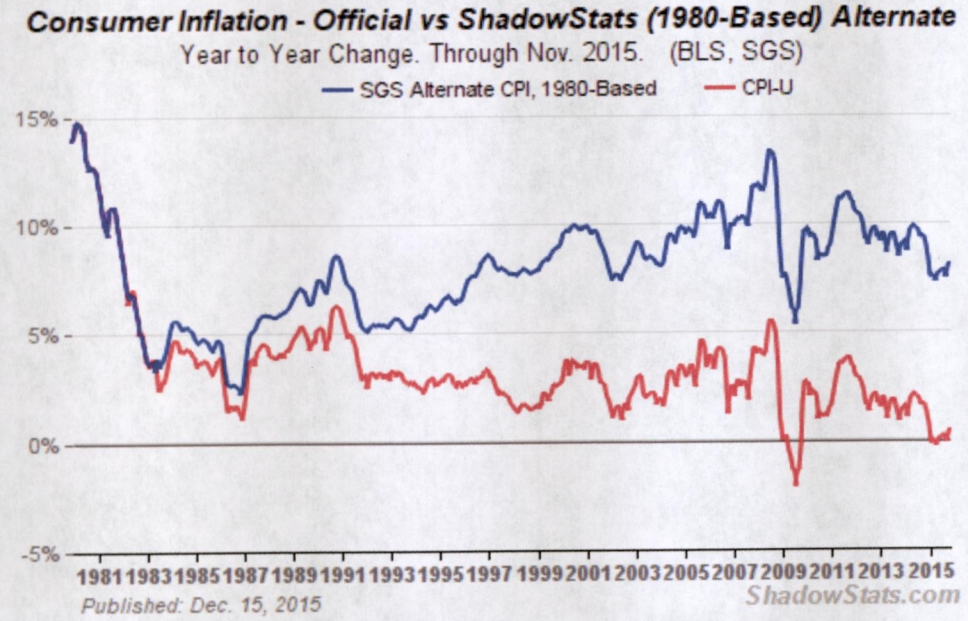


EXHIBIT 2 - 1980-Based Methodology



"THE SHADOW" OF GOVERNMENT INTERVENTION INTO RATES DETERMINES "FREE-MARKET" PRICES AND BENCHMARKS IN "PRIVATE MARKET" DEALS

Beginning on Page 5, the primary grounds raised by SoundExchange that GEO supports are accurately described in the following excerpts from SoundExchange's Petition for Rehearing.

Here, GEO also holds that if the standard by which the Act instructs the Judges is *to assume "no statutory license"*, then a rate increase of $.0003 from $.0014 to $.0017, when the $.0014 rate was clearly based on a previous statutory Pureplay rate, would *prove that all new rates are set based on the previous statutory license rate(s)* — in this case Web I, Web II, and Web III.

Similarly, lowering the subscription rate by $.0003, from $.0025 to $.0022, is no different than above and *assumes a statutory license* — plus it's the opposite of *exclusive rights* in §106.

> "The "Act instructs the Judges to use the willing buyer/willing seller construct, assuming no statutory license." *Web III Remand*, 79 Fed. Reg. 23102, 23107 (Apr. 25, 2014). 10
>
> To comply with this standard, the Judges must assess (a) whether the terms of a proposed benchmark were materially affected by the "shadow" of the statutory rate and, if so, whether an adjustment to account for the shadow is necessary and feasible; and (b) whether the shadow makes the proposed benchmark unreliable and unrepresentative, because the statutory rate eliminated relevant benchmarks that would have been reached above the statutory rate. The Judges fail to assess properly these legal requirements."
>
> "[10] *See also Web II*, 72 Fed. Reg. 24084, 24087 (May 1, 2007) ("[I]t *is difficult to understand* how a license negotiated under the constraints of a compulsory license, where the licensor has no choice but to license, *could truly reflect 'fair market value.'*")" (emphasis already added).

To GEO it's clear and common sense that in all proceedings, including this one, "the shadow makes the proposed benchmark unreliable and unrepresentative, because the statutory rate eliminated relevant benchmarks *that would have been reached above the statutory rate*."

Additionally, from a common sense and an exclusive right perspective, (from footnote 10 above), it really *is difficult to understand* how a license *negotiated under the constraints* of a

compulsory license could truly reflect 'fair-market value' where the '*licensor has no choice but to license'*.

There can be no fair market value *or* negotiation when the licensor has no choice or say.

On Page 6, SoundExchange drives home this point then cites testimony from the record.

> "First, the Judges rely on benchmarks that indisputably were affected by the statutory rate. The headline rates in Pandora-Merlin, for example, **(RESTRICTED)**. And, in deriving a 2016 rate from Pandora-Merlin, the Judges ignore that **(RESTRICTED)** *See* SX PFOF ¶ 518 (citing PAN Ex. 5014 §§ 1(v), 4(a)). Pandora's own expert thus had to admit that "it's obvious" that Pandora-Merlin was "definitely negotiated in the shadow of the pureplay rates." SX PFOF ¶ 154 (quoting Hr'g Tr. 4583:22-24 (May 19, 2015) (Shapiro)); *see also* SX PFOF ¶ 157 (quoting IHM Ex. 3034 ¶ 48 (Fischel/Lichtman AWDT) (per-play rate in iHeart- Warner "is directly affected by the existing statutory rates"))."

On Pages 6, 7 and 8, SoundExchange provides Prof. Talley's evidence that negotiations and agreements "will be *absent* so long as the *shadow exists*", and GEO could not agree more with this key piece of evidence — this is the entire reason why GEO proposed his "electric meter" per-stream rate in Proposal 1 and "cloud locker" or "streaming account" in Proposals's 2 and 3 like Ghosttunes[6] or iTunes Download Service with Apple streaming.

There can be no "hypothetical marketplace", "fair-market" or "free-market" negotiations as long as the compulsory license and statutory rate serve as a "*lowball glass ceiling*". GEO also agrees with Your Honors below that "it would be irrational for a licensor to accept a rate below the statutory rate," yet as SoundExchange points out, *Merlin did the irrational.* In GEO's dealings with Pandora, Mr. Chris Harrison offered and *promised* GEO a direct license in March 2014 (*See* Exhibit GEO2792) but *never delivered* one since he was only looking for an "irrational" benchmark *to use in this rate proceeding*. SoundExchange further explains:

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[6] See GEO's Written Direct Statement ("WDS") October 10, 2014 in Paragraph 1 on Page 7 and footnote 2 http://www.loc.gov/crb/rate/14-CRB-0001-WR/statements/Geo_Music_Group.pdf and GEO's Amended WDS ("AWDS") on January 13, 2015 on Page 10 and footnote 3 which compares GEO's "cloud locker" to a similar market based example like Ghosttunes which is a streaming service owned by Garth Brooks.

"Notwithstanding this evidence, the Judges dismiss the shadow as not "meaningfully affect[ing] the effective steered rates" because those "rates are below the otherwise applicable statutory rates, and it would be irrational for a licensor to accept a rate below the statutory rate when it could have rejected the direct deal and enjoyed the higher statutory rate." *Web IV ID* at 32. But as the Judges recognize two pages later, this decision was not "irrational" because Merlin and Warner "voluntarily agreed to rates below the applicable statutory rates (*in exchange for the steering of more plays*), rather than defaulting to the higher statutory rate." *Id.* at 34 (emphasis already added). In other words, as the Judges concluded in the context of Pandora-Merlin, Merlin members expressly agreed to "the trade-off of more plays at a lower rate for *more total revenue*" than they would have otherwise received under the statutory license. *Id.* at 126 (emphasis already added). But this measure of total revenue relative to what the Merlin members would otherwise have received is inextricably tied to the statutory rate. Hence, Pandora-Merlin necessarily was "negotiated under the constraints of a compulsory license," and therefore does not "*truly reflect 'fair market value.*'" *Web II* at 24087 (emphasis already added).

Second, as the Judges acknowledge, Prof. Talley provided evidence of a "rational and hypothetically correct" economic theory demonstrating that negotiations and agreements for rates above statutory rates will be absent so long as the shadow exists. *Web IV ID* at 33. The Judges erred in discounting this theory as "too untethered from the facts to be predictive or useful in adjusting for the supposed shadow of the existing statutory rate." *Id.* The absence of rates above statutory rates *confirms* Prof. Talley's theory; such absence is not a sound basis for dismissing his analysis. The evidence of agreements *not entered into*—where parties opted for existing statutory or WSA rates—also proves the shadow's downward bias.

This undisputed evidence also shows that iHeart-Warner fails the most basic test of WBWS, namely, "the rates to which, absent special circumstances, *most* willing buyers and willing sellers would agree." *Web II* at 24087 (emphasis already added). The record was clear that **(RESTRICTED)**. Likewise, many indies did not enter into a deal with Pandora (or anyone else) at the Pandora-Merlin rates. *See* SX PFOF ¶¶ 542-550."

All of the above grounds, citations and testimony from experts in this proceeding is further evidence (and from GEO's personal experience over 30 years) that the compulsory license and *statutory rate in all cases*, including non-interactive webcasting and streaming for §114 sound recordings, *depresses the value of the royalties owed* for use of music creators' works through an arbitrary and non-negotiated payment structure, aka, "the shadow". In GEO's vernacular the compulsory rate is a "*boat anchor*" in a sea of royalties or a "*lowball glass ceiling*" for the creators of exclusive rights.

CONCLUSION

For the foregoing reasons, the Court should ACCEPT SoundExchange's Petition for Rehearing to correct a clear error and prevent manifest injustice.

GEO thanks Your Honors for your time and thoughtful consideration.

Dated: Tuesday, January 12, 2016

Respectfully submitted,

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CERTIFICATION OF SERVICE

I, George D. Johnson, ("GEO") an individual and digital sound recording copyright creator, hereby certify that a copy of the foregoing GEORGE JOHNSON'S (GEO) MOTION IN SUPPORT OF SOUNDEXCHANGE PROPOSED PETITION FOR REHEARING has been served this 12th day of January 2016 by electronic mail upon the following parties:

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